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UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

WESTERN DIVISION

FRANK ROCHA, et al., Plaintiffs, v. U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT, Defendant.	Case No. 2:24-cv-07054-DSF-AJR **UNOPPOSED MOTION FOR LEAVE FOR TELEPHONIC APPEARANCE AT SCHEDULING CONFERENCE**

Plaintiffs moves the court for leave to allow Plaintiffs' counsel's telephonic appearance at the January 6, 2024, 11:00 a.m. scheduling conference in this case. Plaintiffs are aware of the Court's general rule that counsel must be present at scheduling conferences. However, Plaintiffs' lead counsel in this case, Jeremy Jong, resides and works in New Orleans, Louisiana. In addition, counsels' employer, Al Otro Lado, is a non-profit legal services organization. ECF No. 3 ¶ 23. The parties have also made

significant progress towards resolving key issues in this case and do not expect to make

legal arguments at the forthcoming scheduling conference in this case. The anticipated

simplicity of the scheduling conference, the distance that Plaintiffs' counsel would have

to travel and the expense to counsel's nonprofit employer constitute extraordinary

circumstances to allow telephonic appearance in this case. Defendant does not oppose

this motion.

Dated: December 20, 2024

  /s/ Jeremy Jong
JEREMY JONG*
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Al Otro Lado, Inc.

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